

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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)	
L.B., individually and on behalf of her)	
minor child Kyle, proceeding under a)	Civ. No. 1:23-cv-08501-RPK-JRC
pseudonym,)	
)	
<i>Plaintiffs,</i>)	
)	
v.)	NOTICE OF MOTION FOR
)	LEAVE TO PROCEED
The City of New York; Jess Dannhauser, in)	ANONYMOUSLY
his official capacity as Commissioner,)	
Administration for Children's Services of)	
the City of New York ("ACS"); Ariel)	
Semper, Nadine Cenord, Bernadet Jean-)	
Louis, Donna McFadden, Ana Costa,)	
Taiesha Coleman, and Leydi Taveras, each)	
individually and in their official capacity as)	
investigators for ACS,)	
)	
<i>Defendants.</i>)	
)	
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PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and Plaintiffs' Complaint (ECF No. 1), the undersigned attorneys for Plaintiffs L.B. and Kyle ("Plaintiffs") will move before the Honorable Rachel P. Kovner, U.S.D.J., at a date and time to be determined, at the United States District Court, 225 Cadman Plaza East, Brooklyn, NY 11201, Courtroom 4E-N, for an order granting Plaintiffs leave to proceed anonymously.

Respectfully submitted,

CROWELL & MORING LLP

Dated: December 4, 2023
New York, New York

By: /s/ Robert A. Mantel
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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

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L.B., individually and on behalf of her)	
minor child Kyle, proceeding under a)	Civ. No. 1:23-cv-08501-RPK-JRC
pseudonym,)	
)	
<i>Plaintiffs,</i>)	
)	
v.)	DECLARATION OF SERVICE
)	
The City of New York; Jess Dannhauser, in)	
his official capacity as Commissioner,)	
Administration for Children’s Services of)	
the City of New York (“ACS”); Ariel)	
Semper, Nadine Cenord, Bernadet Jean-)	
Louis, Donna McFadden, Ana Costa,)	
Taiesha Coleman, and Leydi Taveras, each)	
individually and in their official capacity as)	
investigators for ACS,)	
)	
<i>Defendants.</i>)	
)	
-----	X	

I, Robert Mantel, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury that, on December 4, 2023, I caused a copy of the foregoing Notice of Motion for Leave to Proceed Anonymously and accompanying Memorandum of Law to be served on Defendants, by First-Class Mail, at the following addresses:

The City of New York
New York City Law Department
100 Church Street
New York, NY 10007

Jess Dannhauser
Administration for Children’s Services of the City of New York
150 William Street
New York, NY 10038

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Leydi Taveras
Administration for Children's Services of the City of New York
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Dated: December 4, 2023
New York, New York

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